

PLEASE TAKE NOTICE that upon the accompanying declarations and memorandum of law, as well as all the pleadings and proceedings heretofore had herein, Respondent State Oil Company of the Azerbaijan Republic will move this Court, at the United States Courthouse, 500 Pearl Street, Room 1950, New York, New York, before the Honorable Richard J. Holwell, for an Order pursuant to Rule 12(b)(2) and/or 12(b)(6) of the Federal Rules of Civil Procedure, and/or the principle of forum non conveniens, dismissing Petitioner's motion to confirm arbitration award with prejudice or alternatively staying confirmation of the

arbitration award pending final adjudication of Respondent's appeal before the Swedish Court of Appeal, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
April 25, 2006

PATTERSON BELKNAP, WEBB & TYLER LLP

By: 

John D. Winter (JW-3252)

1133 Avenue of the Americas

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(212) 336-2000

Attorneys for the State Oil Company
of the Azerbaijan Republic

TO: James Berger, Esq.
Paul, Hastings, Janofsky & Walker, L.L.P.
Park Avenue Tower, 75 East 55th Street
New York, NY 10022

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

Ruth Seitz, being duly sworn, says:

I am a resident of the State of New Jersey, over the age of eighteen years, and not a party to the within action. My business address is PATTERSON, BELKNAP, WEBB & TYLER LLP, 1133 Avenue of the Americas, New York, NY 10036-6710. On April 25, 2006, I served the within documents:

NOTICE OF MOTION, DECLARATION OF JOHN D. WINTER,
DECLARATION OF ROVNAG ABDULLAYEV

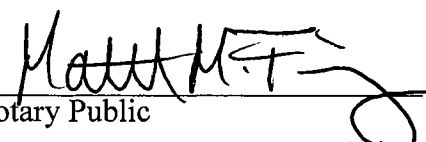
- ☐ I sent such document from facsimile machine (212) 336-2222 on April 25, 2006. I certify that said transmission was completed and that all pages were received and that a report was generated by facsimile machine (212) 336-2222 which confirms said transmission and receipt. I, thereafter, mailed a copy to the interested party(ies) in this action by placing a true copy thereof enclosed in sealed envelope(s) addressed to the parties listed below.
- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in a mail depository maintained by the United States Postal Service at 1133 Avenue of the Americas, New York, NY 10036, addressed as set forth below.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

James Berger, Esq.
PAUL HASTINGS JANOFISKY & WALKER, LLP
Park Avenue Tower, 75 East 55th St.
New York, NY 10022



Ruth Seitz

Sworn to before me this
25th day of April, 2006



Notary Public
MATTHEW M. FINNEGAN
Notary Public, State of New York
No. 01FI5080222
Qualified in New York County
Commission Expires June 16, 2007